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May 23, 2003

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The Honorable J. Frederick Motz
United States District Judge
United States District Court
District of Maryland
101 W. Lombard Street
Baltimore, MD 21201

Re: *White v. Global Commerce and Information, Inc.*,
Civil Action No. JFM 03-26 (D. Md.)

Dear Judge Motz:

We write per the suggestion of Brian, your law clerk, regarding the procedure for resolving discovery disputes and, specifically, whether the parties can take advantage of your "call-in hour" or whether the parties should follow the Court's formal briefing schedule in light of the circumstances of our situation. The defendant's counsel has authorized us to submit this letter to you.

Plaintiff served her First Set of Interrogatories and First Set of Requests for Production on defendant on February 21, 2003. Defendant served its written responses on April 9, 2003. By overnight delivery sent April 14, 2003, defendant served responsive documents on plaintiff. Commencing by letter dated April 24, 2003 and continuing to date by both letter and telephone conference, the parties have been working to resolve what plaintiff perceives as deficiencies in defendant's discovery responses. While the parties have made progress and have been able to resolve a number of issues, there still remain a significant number of issues which the

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parties cannot resolve (i.e. a minimum of five interrogatories with corresponding requests for documents). Discovery in this case is scheduled to close on June 23, 2003. The parties are working cooperatively to schedule depositions but it is conceivable that depositions could be delayed because of the disputes over written discovery.

Plaintiff would like to take advantage of your "call-in hour" for the resolution of discovery disputes to determine whether these outstanding issues can be resolved informally. Defendant does not believe that the call-in hour is best suited for these disputes but is agreeable if the Court thinks the call-in hour procedure is the most appropriate way to resolve the matter. If the call-in hour is used, the parties believe that they will need more than fifteen minutes for a telephone conference with the Court and more than two pages to adequately explain the issues to the Court. Accordingly, we write to seek guidance as to the procedure by which these discovery disputes should be presented to the Court for resolution.

Thank you for your consideration of this matter and your assistance to the parties.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Anessa Abrams".

Anessa Abrams
Attorney for Plaintiff

cc: Teresa Burke Wright, Esq.
Attorney for Defendant